



Tiana Demas
Partner
T: 212 479 6560
tdemas@cooley.com

September 2, 2022

Hon. Denise L. Cote
United States District Judge
500 Pearl Street, Room 188
New York, N.Y. 10007-1312

Re: Martin v. Meredith Corp. et al., 1:22-cv-04776 (DLC)

Dear Judge Cote:

We represent Defendants Meredith Corporation, Meredith Holdings Corporation, IAC/Interactive Corp., Dotdash Media, Inc., and Dotdash Meredith, Inc. ("Defendants") in the above-referenced action. We write to respectfully request, with Plaintiff's consent, (a) an enlargement of pages for the parties' forthcoming briefing on Defendants' Motion to Dismiss the Complaint ("Motion to Dismiss"), and (b) a short extension of the deadline by which Defendants must file their Motion to Dismiss. The parties also seek the Court's approval of the full briefing schedule below. This is Defendants' first request for an extension in this matter.

First, we respectfully request a 10-page enlargement of the Court's default page limit for Defendants' Motion to Dismiss, to 35 pages total. Defendants request this enlargement because they intend to challenge Plaintiff's claims pursuant to both Rule 12(b)(1)—lack of subject matter jurisdiction—and Rule 12(b)(6)—failure to state a claim. The requested enlargement is necessary to sufficiently address these procedural challenges, the allegations contained in the 42-page complaint, and each of Plaintiff's five claims. Plaintiff consents to this request, provided he receives 35 pages for his anticipated opposition to Defendants' Motion to Dismiss. Defendants likewise consent to Plaintiff's request.

Second, the parties have conferred and agreed to a full briefing schedule for the Motion to Dismiss. Defendants respectfully request a one-week extension of the current September 9, 2022 deadline to file the Motion to Dismiss, to September 16, 2022. This brief extension—to which Plaintiff consents—is necessary so Defendants can complete their investigation and analysis of the jurisdictional questions and other legal issues raised by the Complaint.

The parties seek the Court's approval of the below briefing schedule, which is designed provide sufficient time to fully address the legal issues raised in the Complaint.

- Defendants will have until September 16, 2022 (extended from the current September 9, 2022 deadline) to file their Motion to Dismiss, which shall not exceed 35 pages.
- Plaintiff will have until October 28, 2022 (42 days after the filing of the Motion to Dismiss) to file his opposition, which shall not exceed 35 pages.



Hon. Denise L. Cote
September 2, 2022
Page Two

- Defendants will have until November 30, 2022 (33 days after the filing of Plaintiff's response) to file a reply.¹

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tiana Demas", written over a horizontal line.

Tiana Demas

TD

cc: All Parties (*via ECF*)

¹ Once Defendants have reviewed Plaintiff's response, Defendants may seek an enlargement of pages for their reply, if necessary, to fully address the issues raised.